

Application No.: 10/725,859  
Art Unit: 2194

Docket No.: MWS-093

### **REMARKS**

Claims 1-7, 9-19, 21-33 and 35 are currently pending, of which claims 1, 12, 22 and 27 are independent. Claims 8, 20 and 34 have been canceled without prejudice or disclaimer. Claims 1-5, 12-17, 22 and 27-31 have been amended to better claim the invention.

#### **I. Amendments to the Specification**

Applicants have amended page 15, lines 9-11 of the specification to correct various clerical errors. No new matter has been added.

#### **II. Summary of Claim Rejections**

In the Office Action:

claims 1-11 and 22-35 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter;

claims 1-5, 7-17, 19-22, 24-31 and 33-35 were rejected under 35 U.S.C. § 102(b) as being anticipated by United States Patent Number 5,995,100 to Auslander et al. (hereafter "Auslander"); and

claims 6, 18, 23 and 32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Auslander in view of R. Engelschall "Apache 1.3 Dynamic Shared Object (DSO) Support," pp. 1-8 (hereafter "Engelschall").

#### **III. Claim Rejections under 35 U.S.C. § 101**

In the Office Action, the Examiner has rejected claims 1-11 and 22-35 under 35 U.S.C. § 101 as being directed to non-statutory subject matter (Office Action, paragraph 2).

Applicants respectfully believe claims 1-11 and 22-35 are directed to statutory subject matter, and respectfully request reconsideration and withdrawal of the above 35 U.S.C. § 101 rejection of claims 1-11 and 27-35.

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Regarding claims 22-26, the Examiner states that the body of the claims merely contains software components. Claims 22-26 include a "processor" and "storage." Applicants believe these claims are directed to statutory subject matter, and respectfully request reconsideration and withdrawal of the above 35 U.S.C. § 101 rejection of claims 22-26.

**IV. Claim Rejections under 35 U.S.C. § 102**

In the Office Action, the Examiner has rejected claims 1-5, 7-17, 19-22, 24-31 and 33-35 under 35 U.S.C. § 102(b) as being anticipated by Auslander (Office Action, paragraph 3). Applicants respectfully traverse this rejection.

**i) Claim 1**

Independent claim 1 recites:

1. A computer-implemented method of accessing a library function in a shared library from a dynamic environment, comprising:  
*processing a header file of the library function to automatically specify parameter information for creating an interface to access the library function;*  
creating the interface to the library function in the shared library using the parameter information, *the interface automatically converting a data type in an input to the interface to a selected data type for the library function;* and  
saving the interface to the library function in an executable form for subsequent use.

Applicants respectfully urge that Auslander fails to disclose or suggest at least the following features of claim 1: *the interface automatically converting a data type in an input to the interface to a selected data type for the library function*, and *processing a header file of the library function to automatically specify parameter information for creating an interface to access the library function*.

Auslander discusses generating custom controls for invoking modules in a library. The custom controls may be self-contained modules providing elements of a user interface (Auslander, column 1, lines 29-30). A Custom Control Generator may be used to create custom controls which may act as user interfaces that allow a user to invoke modules in a library

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(Auslander, column 3, lines 43-45). For example, Figure 7 in Auslander illustrates a custom control that may be used for a login module generated by the Custom Control Generator. The custom control displays three fields 94, 96 and 98 for inputs to the login function (Auslander, column 6, lines 35-45). The user enters the desired input into the fields to invoke the login function in the library (Auslander, column 6, lines 35-45).

Auslander does not disclose or even mention that the custom control interface automatically converts a data type in an input to the custom control to a selected data type for the library function. In fact, Auslander does not address handling inputs of different data types entered by a user in one particular input field of a custom control. Thus, Auslander fails to disclose an *interface automatically converting a data type in an input to the interface to a selected data type for the library function*, which is present in claim 1.

Furthermore, Auslander fails to disclose *processing a header file of the library function to automatically specify parameter information for creating an interface to access the library function*, which is present in claim 1. The Custom Control Generator of Auslander may accept as input the library, header fields for the library, and a specified calling sequence of selected modules within the library (Auslander, abstract). The Custom Control Generator relies on a user to define all the characteristics of the parameters used by the module (Auslander, column 4, lines 15-18, and column 5, lines 57-59). For example, the user must identify whether a particular parameter field will be used, whether the data stored in the field needs to be persistent, and whether to generate GET and SET methods for the field (Auslander, column 5, lines 50-57). The user manually defines these parameter characteristics through a dialog box (Auslander, column 2, lines 24-27, and Figures 5 and 6).

Thus, the generation of a user interface for library modules in Auslander *depends on a user manually defining parameter characteristics*. Applicants' claim 1, on the other hand, includes *automatically specifying parameter information* which, as noted above, is not disclosed or suggested by Auslander.

For the reasons set forth above, Applicants respectfully urge that Auslander does not disclose or suggest each and every element of claim 1. Therefore, Applicants respectfully urge that the Examiner withdraw the above 35 U.S.C. § 102(b) rejection of claim 1.

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**ii) Claims 2-5 and 7-11**

Claims 2-5, 7 and 9-11 depend from independent claim 1 and, thus, incorporate all of the elements of claim 1. Accordingly, Applicants respectfully urge that claims 2-5, 7 and 9-11 are allowable for at least the reasons set forth above with respect to claim 1. Therefore, Applicants respectfully request that the above 35 U.S.C. § 102(b) rejection of claims 2-5, 7 and 9-11 be withdrawn.

Claim 8 is canceled. Thus, the above 35 U.S.C. § 102(b) rejection of claim 8 is moot.

**iii) Claim 12**

Independent claim 12 recites:

12. A computer-implemented method of accessing a library function in a shared library from a dynamic environment, comprising:

- loading the library function from the shared library;
- generating an interface to access the library function by automatically specifying parameter information for the interface to the library function, the interface automatically converting a data type in an input to the interface to a selected data type for the library function;*
- saving the interface to the library function in an executable form for subsequent use; and
- executing the library function using the interface from the shared library.

Applicants respectfully urge that Auslander fails to disclose at least the following features of claim 12: *the interface automatically converting a data type in an input to the interface to a selected data type for the library function, and generating an interface to access the library function by automatically specifying parameter information for the interface to the library function.*

As discussed above with respect to claim 1, Auslander fails to disclose *automatically converting a data type in an input to the interface to a selected data type for the library function, and automatically specifying parameter information for the interface to a library*

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*function*. Therefore, Applicants respectfully urge that claim 12 is allowable for at least this reason.

For reasons set forth above, Applicants respectfully urge that Auslander does not disclose or suggest each and every feature of claim 12. Therefore, Applicants respectfully request that the Examiner withdrawn the above 35 U.S.C. § 102(b) rejection of claim 12.

iv) Claims 13-17 and 19-21

Claims 13-17, 19 and 21 depend from independent claim 12 and, as such, incorporate all of the elements of claim 12. Accordingly, claims 13-17, 19 and 21 are allowable for at least the reasons set forth above with respect to claim 12. Applicants therefore respectfully request that the Examiner withdraw the above 35 U.S.C. § 102(b) rejection of claims 13-17, 19 and 21.

Claim 20 is canceled. Thus, the above 35 U.S.C. § 102(b) rejection of claim 20 is moot.

v) Claim 22

Independent claim 22 recites:

22. A computer-implemented system for calling a shared library from a dynamic environment, the system comprising:  
a storage; and  
a processor configured to:  
execute an application providing a dynamic environment,  
execute a shared library accessible by the dynamic environment,  
*execute an automated processing function for automatically specifying parameter information for creating and saving an interface to access a library function to enable execution of the library function from the shared library, the interface automatically converting a data type in an input to the interface to a selected data type for the library function, and*  
save the interface to the library function in an executable form for subsequent use.

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Applicants respectfully urge that Auslander fails to disclose at least the following features of claim 22: *the interface automatically converting a data type in an input to the interface to a selected data type for the library function, and an automated processing function for automatically specifying parameter information for creating and saving an interface to access a library function to enable execution of the library function from the shared library.*

As discussed above with respect to claim 1, Auslander fails to disclose or suggest at least *automatically converting a data type in an input to the interface to a selected data type for the library function and automatically specifying parameter information for the interface to a library function.* Thus, Auslander fails to disclose or suggest all of the features of claim 22. Therefore, Applicants respectfully urge that claim 22 is allowable for at least this reason.

For reasons set forth above, Applicants respectfully urge that Auslander does not disclose or suggest each and every feature of claim 22. Therefore, Applicants respectfully request that the Examiner withdrawn the above 35 U.S.C. § 102(b) rejection of claim 22.

vi) Claims 24-26

Claims 24-26 depend from independent claim 22 and, therefore, incorporate all of the elements of claim 22. Accordingly, claims 24-26 are allowable for at least the reasons set forth above with respect to claim 22. Applicants therefore respectfully request that the Examiner withdraw the above 35 U.S.C. § 102(b) rejection of claims 24-26.

vii) Claim 27

Independent claim 27 recites:

27. A medium for use in a modeling and execution environment on an electronic device, the medium holding instructions executable using the electronic device for performing a computer-implemented method of accessing a library function in a shared library from a dynamic environment, the method comprising:  
*processing a header file of the library function to automatically specify parameter information for creating an interface to the library function;*  
creating the interface to access the library function in the shared library using the parameter information, *the interface*

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*automatically converting a data type in an input to the interface to a selected data type for the library function; and*  
saving the interface to the library function in an executable form for subsequent use.

Applicants respectfully urge that Auslander fails to disclose at least the following features of claim 27: *the interface automatically converting a data type in an input to the interface to a selected data type for the library function, and processing a header file of the library function to automatically specify parameter information for creating an interface to access the library function.*

As discussed above with respect to claim 1, Auslander fails to disclose *automatically converting a data type in an input to the interface to a selected data type for the library function* and *automatically specifying parameter information for the interface to a library function*. Thus, Auslander fails to disclose or suggest all of the features of claim 27. Therefore, Applicants respectfully urge that claim 27 is allowable for at least this reason.

For reasons set forth above, Applicants respectfully urge that Auslander does not disclose or suggest each and every feature of claim 27. Therefore, Applicants respectfully request that the Examiner withdrawn the above 35 U.S.C. § 102(b) rejection of claim 27.

**viii) Claims 28-31 and 33-35**

Claims 28-31, 33 and 35 depend from independent claim 27 and, thus, incorporate all of the elements of claim 27. Accordingly, claims 28-31, 33 and 35 are allowable for at least the reasons set forth above with respect to claim 27. Applicants therefore respectfully request that the Examiner withdraw the above 35 U.S.C. § 102(b) rejection of claims 28-31, 33 and 35.

Claim 34 is canceled. Thus, the above 35 U.S.C. § 102(b) rejection of claim 34 is moot.

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**V. Claim Rejections under 35 U.S.C. § 103**

In the Office Action, the Examiner has rejected claims 6, 18, 23 and 32 under 35 U.S.C. § 103(a) as being unpatentable over Auslander in view of Engelschall (Office Action, paragraph 4). Applicants respectfully traverse this rejection.

Applicants urge that the Auslander and Engelschall, taken either alone or in any reasonable combination, fail to disclose or suggest all of the features of claims 6, 18, 23 and 32.

Claims 6, 18, 23 and 32 are dependent on claims 1, 12, 22 and 27, respectively. As noted above, Auslander fails to teach various features of claims 1, 12, 22 and 27. For example, Auslander fails to disclose or suggest at least *automatically converting a data type in an input to the interface to a selected data type for the library function*, and *automatically specifying parameter information for creating an interface to access a library function*. Since these features are also present in claims 6, 18, 23 and 32, Auslander also fails to disclose or suggest these features in claims 6, 18, 23 and 32.

Applicants respectfully urge that the teachings of Engelschall do not supplement Auslander in such a way as to cure Auslander's failure to disclose or suggest the above features. For example, Engelschall fails to disclose or suggest at least *the interface automatically converting a data type in an input to the interface to a selected data type for the library function* and *processing a header file of the library function to automatically specify parameter information for creating an interface to access the library function*, which are present in claim 1. Since claim 6 is dependent on claim 1, Engelschall does not disclose at least these features in claim 6. Thus, Engelschall does not cure the shortcomings of Auslander with respect to claim 6.

Applicants respectfully urge that Auslander and Engelschall, taken either singly or in any reasonable combination, do not disclose or suggest all of the features of claim 6. Therefore, Applicants respectfully request that the above 35 U.S.C. § 103(a) rejection of claim 6 be withdrawn.



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Applicants respectfully urge that Engelschall fails to disclose or suggest at least *the interface automatically converting a data type in an input to the interface to a selected data type for the library function, and generating an interface to access the library function by automatically specifying parameter information for the interface to the library function*, which are present in claim 12. Claim 18 depends from claim 12 and thus, incorporates all of the features of claim 12. As such, Applicants respectfully urge that Auslander and Engelschall, taken either singly or in any reasonable combination, fail to disclose or suggest all of the features of claim 18. Therefore, Applicants respectfully request that the above 35 U.S.C. § 103(a) rejection of claim 18 be withdrawn.

Applicants respectfully urge that Engelschall fails to disclose or suggest at least *the interface automatically converting a data type in an input to the interface to a selected data type for the library function, and an automated processing function for automatically specifying parameter information for creating and saving an interface to access a library function to enable execution of the library function from the shared library*, which are present in claim 22. Claim 23 depends from claim 22 and thus, incorporates all the features of claim 22. As such, Applicants respectfully urge that Auslander and Engelschall, taken either singly or in any reasonable combination, fail to disclose or suggest all of the features of claim 23. Therefore, Applicants respectfully request that the above 35 U.S.C. § 103(a) rejection of claim 23 be withdrawn.

Applicants respectfully urge that Engelschall fails to disclose or suggest at least *the interface automatically converting a data type in an input to the interface to a selected data type for the library function, and processing a header file of the library function to automatically specify parameter information for creating an interface to access the library function*, which are present in claim 27. Claim 32 depends from claim 27 and thus, incorporates all the features of claim 27. As such, Applicants respectfully urge that Auslander and Engelschall, taken either singly or in any reasonable combination, fail to disclose or suggest all of the features of claim 32. Therefore, Applicants respectfully request that the above 35 U.S.C. § 103(a) rejection of claim 32 be withdrawn.

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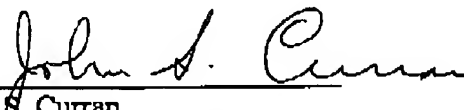
**CONCLUSION**

In view of the foregoing claim amendments and remarks, Applicants believe that all claims should be passed to allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact the Applicants' attorney at (617) 227-7400.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-093. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. §1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

Dated: February 20, 2008

Respectfully submitted,

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